



Alexandria/Arlington Resource Recovery Facility
Fiscal Year 2015
Second Quarter Operating Report



February
2015

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Definition of Abbreviations & Acronyms

Abbreviation/Acronym

APC
Apr
Aug
Avg
Btu
CAAI
CEMS
CO
Dec
Feb
FMG
FY
gal
GAT
HCl
HDR
ID
Jan
Jul
Jun
klbs
kWhr
lbs
LOA
Mar
Max
May
Min
MSW
MWhr
No
NOV
Nov
NO_x
Oct

OSHA
PDS
ppm
ppmdv
PSD
Q1
Q2
Q3
Q4
RE
RNE
SDA
Sep
SO₂
TCLP

VADEQ
WL
yr
YTD

Definition

Air Pollution Control
April
August
Average
British thermal unit
Covanta Alexandria Arlington, Inc.
Continuous Emissions Monitoring System
Carbon Monoxide
December
February
Facility Monitoring Group
Fiscal Year
Gallon
Guaranteed Annual Tonnage
Hydrochloric (Hydrogen Chlorides)
HDR Engineering Inc
Induced Draft
January
July
June
Kilo-pounds (1,000 lbs)
Kilowatt hours (1,000 watt-hours)
Pounds
Letter of Agreement
March
Maximum
May
Minimum
Municipal Solid Waste
Megawatt hours
Number
Notice of Violation
November
Nitrogen Oxide
October
Occupational Safety and Health
Administration
Potomac Disposal Services
Parts per million
Parts per million dry volume
Prevention of Significant Deterioration
First Quarter
Second Quarter
Third Quarter
Fourth Quarter
Reportable Exempt
Reportable Non-Exempt
Spray Dryer Absorber
September
Sulfur Dioxide
Toxicity Characteristic Leaching Procedure
Virginia Department of Environmental
Quality
Warning Letter
Year
Year to date

Alexandria/Arlington Waste-to-Energy Facility Second Quarter Operating Report – Fiscal Year 2015

1.0 Purpose of Report

HDR Engineering, Inc. (HDR) was given authorization by the Facility Monitoring Group (FMG) to conduct quarterly inspections and provide quarterly monitoring reports regarding the operation and maintenance of the Covanta Alexandria/Arlington Waste-to-Energy Facility (Facility) for the 2014 calendar year. This report is prepared for the second quarter of the 2015 fiscal year and summarizes Facility operations between October 1, 2014 and December 31, 2014. This report identifies the fiscal year beginning on July 1, 2014 as FY15 and the quarter beginning on October 1, 2014 as Q2FY15.

This report is based upon the experience HDR has in the waste-to-energy industry, upon site observation visits and previous reports provided by HDR, and upon data provided by Covanta Alexandria / Arlington, Inc. (CAAI), the Facility owner and operator.

2.0 Executive Summary

CAAI operated the Facility in an acceptable manner and in accordance with established waste-to-energy industry practices during Q2FY15. The operation of the Facility, maintenance, safety, and overall cleanliness continue to be above average. Environmental performance was excellent with no reportable environmental excursions throughout the quarter.

During Q2FY15, the Facility experienced one (1) instance of unscheduled downtime for the boilers totaling 30.5 hours, and one (1) instance of unscheduled downtime for the turbine generators totaling 9.0 hours. Beginning October 12, 2014, Boiler No. 2 experienced 110.7 hours of downtime for scheduled maintenance. Beginning November 8, 2014, Boiler No. 3 experienced 131.5 hours of downtime and Turbine Generator No. 1 experienced 107.3 hours of downtime for scheduled maintenance. The boilers experienced three (3)

instances of standby time totaling 84.2 hours, and the turbine generators experienced one (1) instance of standby time totaling 63.0 hours during the quarter. A detailed listing of downtime is provided in Section 5.2 of this report.

Average waste processed during the quarter was 928.9 tons per day, or 95.3% of nominal facility capacity. Waste deliveries averaged 936.1 tons per day, which is 0.8% higher than the burn rate. The capacity utilization of 95.3% compares favorably to industry averages, which are generally in the 88% to 92% range.

Performance trends for various measurements are presented in Section 4. In general, the Facility continues to demonstrate reasonable consistency in month to month performance throughout the most recent three-year period tracked for detailed comparisons.

During the quarter, MSW processed increased 0.2% from the corresponding quarter in FY14; steam production increased 2.4%, and electricity generated (gross) increased 12.2% from the corresponding quarter in FY14. The increase in steam generation was largely attributable to the increase (4.2%) in the calculated average waste heating value, as well as less (177.6 fewer hours) scheduled, unscheduled, and standby downtime experienced by the boilers. The increase in gross electrical generation in Q2FY15 as compared to Q2FY14 is attributable to the increase in steam production, as well as less (684.0 fewer hours) of scheduled, unscheduled, and standby downtime experienced by the turbine generators. Note that Turbine Generator No. 2 had a major overhaul during the corresponding quarter in FY14 (November 2013) and experienced 494.8 hours of downtime.

3.0 Facility Inspection and Records Review

In November 2014, HDR met with the Facility management and other plant personnel to discuss Facility operations and maintenance, acquire Facility data and reports, perform an independent visual inspection of the operating Facility, photograph areas of interest, and perform a review of recent Facility activity. This

visit was coordinated with the scheduled FMG Meeting. At the time of the visit, HDR reviewed CAAI records, discussed performance issues with CAAI staff, and provided a verbal report and performance statistics. HDR maintains a running tabulation of the status of corrective actions and plant performance trends. CAAI provides the following documents for each month:

- Facility Monthly Operating Reports
- Monthly Continuous Emissions Monitoring System (CEMS) Reports

Table 1 summarizes maintenance, repair, and plant condition issues reported during this and prior audit reporting periods. An “A” indicates an issue of the highest priority and worthy of immediate attention. Such items are usually safety or operability issues. A “B” indicates that the issue needs to be dealt with as quickly as possible, but is not urgent. These items will usually result in a process improvement or will help avoid future “urgent” issues. A “C” indicates that the issue should be dealt with at the earliest convenience, but is not a priority issue. This category might include issues related to aesthetics, non-urgent maintenance, or housekeeping improvements which are not safety related.

Table 1: Summary of Audit Report Deficiencies

*A is highest priority & demands immediate attention; B needs attention, but is not urgent; C can be addressed at earliest opportunity & is not urgent.

Item No.	Audit Report Deficiencies	Issue Reported	Priority*	Resolution/Status	Date Resolved	Open / Closed
1	Spider cracking at scale entry area	July 2010	C	Repair		Open
2	Pothole at truck entry roadway	May 2012	C	Repair		Open
3	Concrete to roadway drain at truck entrance damaged – exposing reinforcing bar	May 2014	C	Repair damaged concrete		Open
4	Turbine Generator Enclosure Roof Leaking (3 Locations Observed)	August 2014	C	Repair roof		Open
5	Corrosion on ceiling panels in Turbine Generator Enclosure	August 2014	C	Sand, Prime, Paint and Preserve		Open
6	Corrosion on ceiling panels in Turbine Generator Enclosure (Alternate Location)	August 2014	C	Sand, Prime, Paint and Preserve		Open
7	Damaged Tipping Floor wall panels – Rainwater running from outside to inside	August 2014	C	Repair damaged Tipping Floor Walls		Open
8	Tipping Floor Enclosure roof leaking at truck entrance	August 2014	C	Repair roof	November 2014	Closed
9	Tire supporting PVC drain pipe at Tipping Floor Entrance	August 2014	C	Properly support drain pipe	November 2014	Closed
10	Exterior siding discolored outside Charging Floor louver above Administration Entrance	August 2014	C	Pressure wash siding around louver	November 2014	Closed
11	Deteriorated purlin west wall in Tipping Floor Enclosure - See Figure 1 (Appendix B)	November 2014	C	Replace deteriorated purlin		Open
12	Missing glass windowpanes west wall in Tipping Floor Enclosure – See Figure 2 (Appendix B)	November 2014	C	Install missing windowpanes		Open
13	Damaged curbing southwest corner of Facility near Citizen's Drop-off – See Figure 3 (Appendix B)	November 2014	C	Repair curbing		Open
14	Damaged curbing east side of Cooling Towers – See Figure 4 (Appendix B)	November 2014	C	Repair curbing		Open
15	Pot-hole where pavement and concrete meet entering Tipping Floor Enclosure – See Figure 5 (Appendix B)	November 2014	C	Repair pavement		Open
16	Damaged curbing near Ash Trailer Parking Area – See Figure 6 (Appendix B)	November 2014	C	Repair curbing		Open

4.0 Facility Performance

Monthly operating data provided by CAAI indicates that 85,456 tons of MSW were processed during Q2FY15, and a total of 86,121 tons of MSW including 1,814 tons of Special Handling Waste were received. Total ash production during the quarter was 17,912 tons, which represents 21.0% of the waste processed. The average uncorrected steam production rate for Q2FY15 was 3.1 tons_{steam}/ton_{waste}, which is 2.2% more than the corresponding quarter in FY14. The increase in this metric is attributable to the increase (4.2%) in the calculated average waste heating value that was experienced during the quarter, as compared to the corresponding quarter in FY14.

Chart 1: Tons of Waste Processed

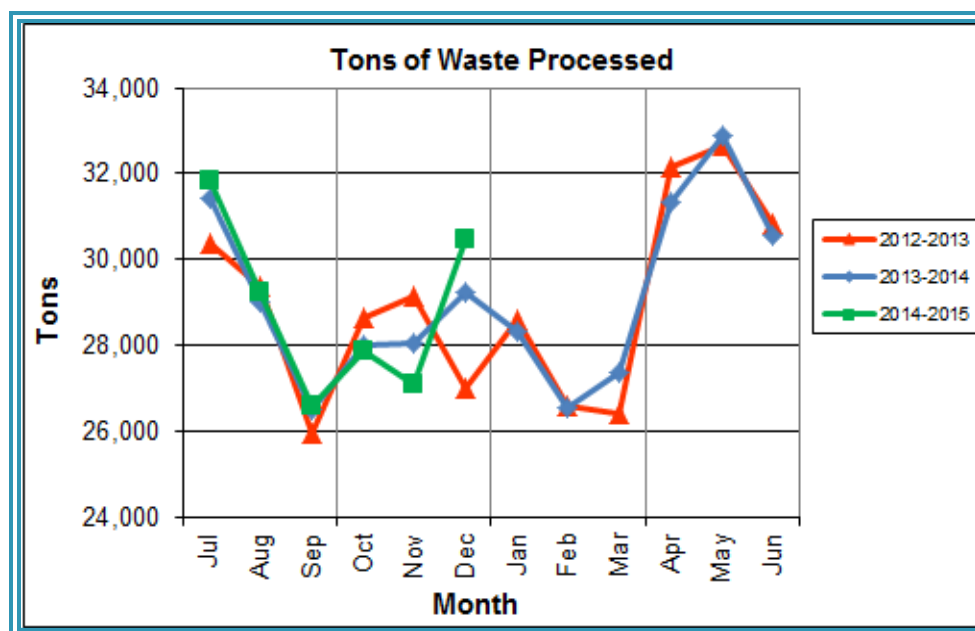


Chart 1 illustrates that Q2FY15 waste processed was slightly higher (0.2%) than the corresponding quarter, Q2FY14.

CAAI reported that 455 tipping floor/MSW internal inspections were conducted during the quarter and CAAI issued seven (7) notices of violation (NOVs) for the following:

- October 2014 – Two (2) NOVs were issued for:
 - Driver hitting the radiation detector housing
 - Unbuckling turnbuckle prior to entering the Tipping Floor

- November 2014 – Three (3) NOVs were issued for:
 - Two (2) NOVs for trash on tops of trucks
 - Driver entering the tipping floor before being cleared to do so by the operator
- December 2014 – Two (2) NOVs were issued for:
 - Demolition debris in the load
 - Entering the tipping floor without being cleared to do so by the operator

Chart 2: Tons of Ash Produced per Ton of Waste Processed

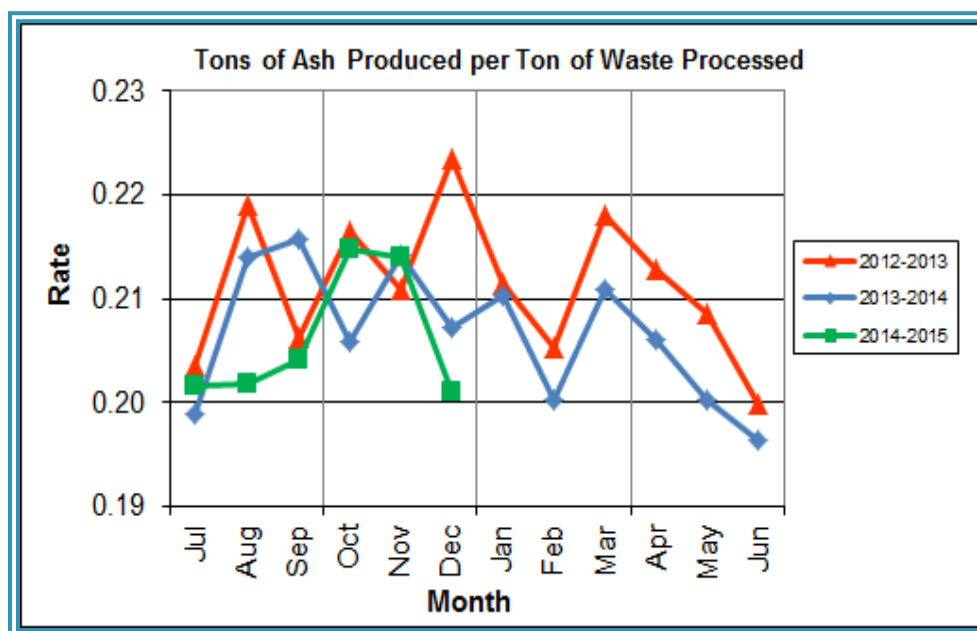


Chart 2 illustrates that ash production rates in Q2FY15 are slightly higher (0.2%) at 21.0% of processed waste, compared to the corresponding quarter in FY14 when the ash production rate was 20.9% of processed waste. Ash production remains in the 20.0% to 21.0% range, as a result of the installation of the “semi-dry” ash discharger spray system in May 2012, and represents less moisture in the ash residue shipped to disposal. Another contributing factor is increased metal recovery in the recent months following the installation of a new ferrous magnet shell during the latter part Q2FY14 (December 2013).

Chart 3: Ferrous Recovery Rate

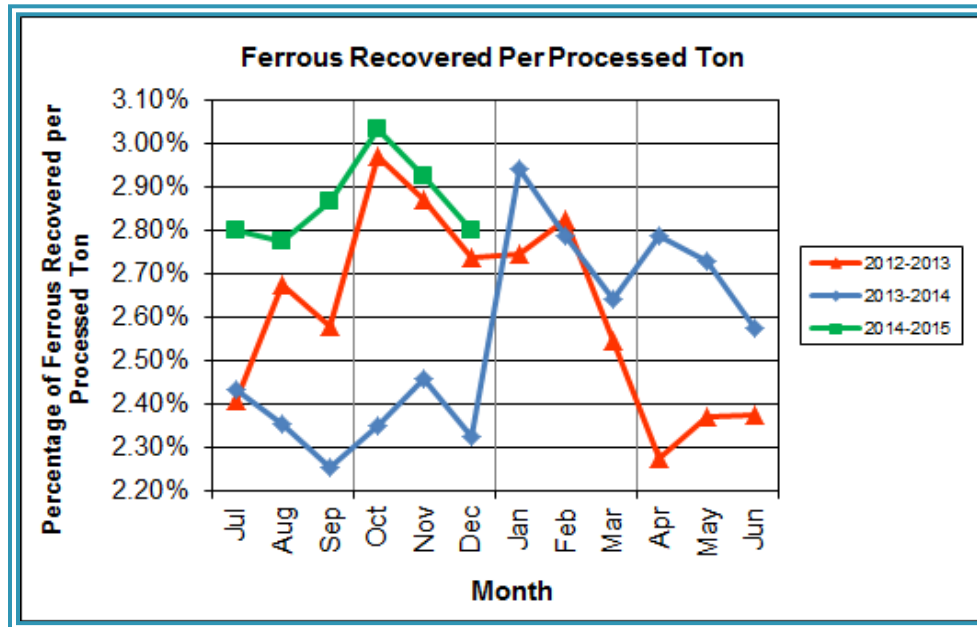
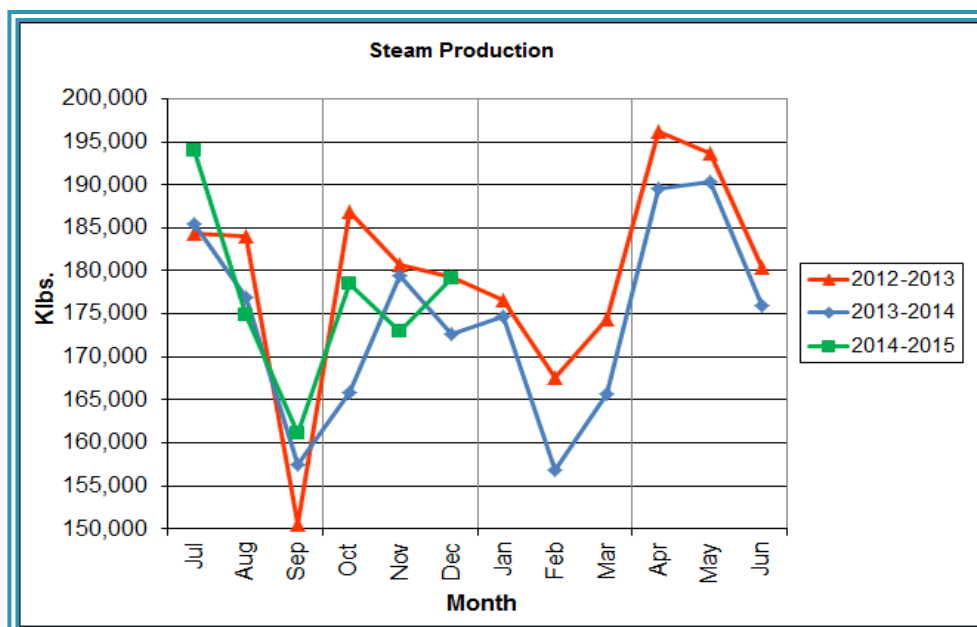


Chart 3 depicts the monthly ferrous metal recovery rate as a percentage of processed MSW tonnage. In Q2FY15, 2,492 tons of ferrous metals were recovered, which is 22.9% higher than the corresponding quarter in FY14 and equivalent to 2.9% of processed waste. The increase in ferrous metal recovery is attributable to the installation of a ferrous magnet shell, which was replaced during an outage in Q2FY14 (December 2013).

Chart 4: Steam Production



In Chart 4, the total steam production for Q2FY15 was 530,413 klbs., and 2.4% higher than the corresponding quarter in FY14. The increase in steam production is attributable to the higher (4.2%) calculated average waste heating value during the quarter, as well as less (177.6 fewer hours) scheduled, unscheduled, and standby downtime experienced by the boilers.

Chart 5: 12-Month Rolling Steam Production

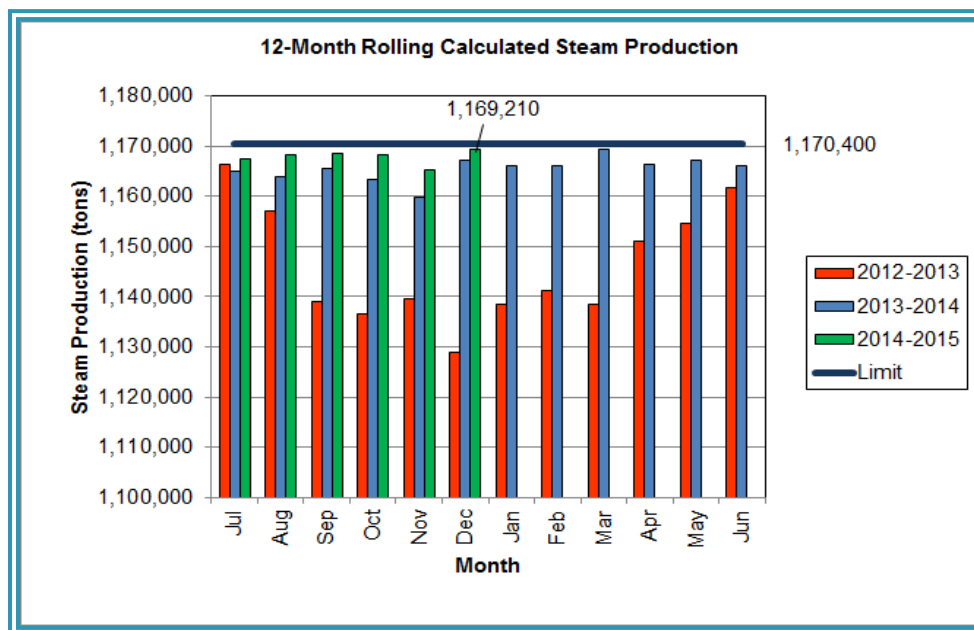
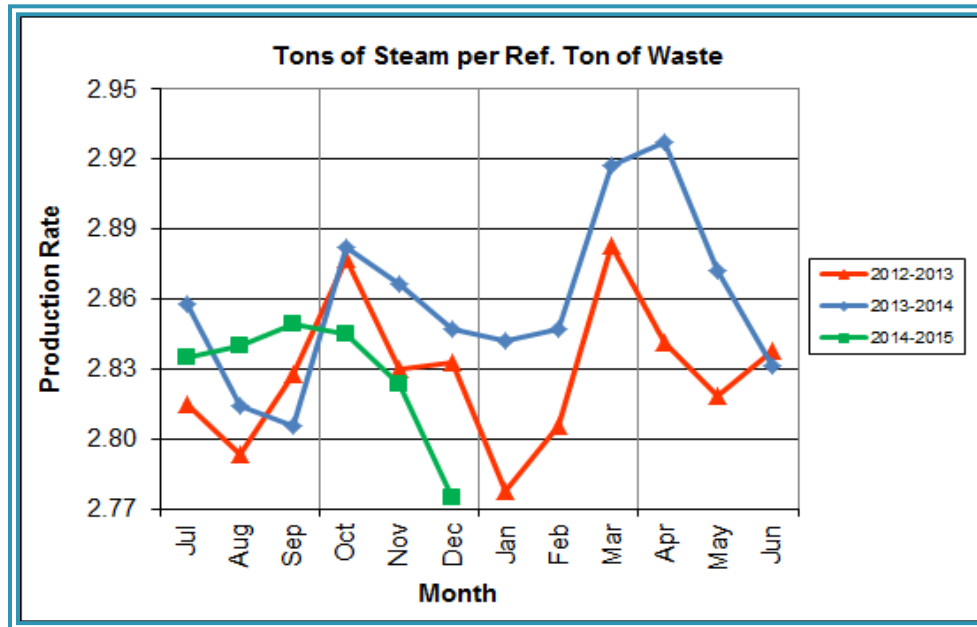


Chart 5 depicts the 12-month rolling steam production total for the period ending in December 2014. According to the Title V permit, the annual steam production for the Facility shall not exceed 1,170,400 tons on the basis of an average value of 3.34 lbs of steam per lb of MSW processed, calculated monthly as the sum of each consecutive 12 month period. The Facility was in compliance with the 12-month rolling steam production total every month in the quarter. The 12-month rolling total for steam production ending in December 2014 was 1,169,210 tons which is 99.9% of the limit. Chart 5 clearly shows that Facility throughput, and in turn, steam and electricity production are being throttled to stay ever so slightly below the steam production limit nearly every month.

Chart 6: Steam Production Rate



In Chart 6, the conversion of raw waste tonnages into “reference tons” is another way of analyzing steam production, and helps to determine whether changes are related to boiler performance or to fuel issues. “Reference tons” are adjusted to account for the calculated average fuel heating value, so that lower Btu fuel raw tonnages are adjusted upwards and vice versa. In Q2FY15, this metric tracked lower (1.8%) at 2.8 tons_{steam}/ton_{ref}, than the corresponding quarter in FY14. This chart shows a three-month (Q2FY15) moderate downtrend in the normalized steam production rate compared to the same period during the prior two (2) years. This trend should continue to be monitored to determine if it is indicative of poorer boiler performance, an aberration during scheduled outage periods, or some other currently unexplained cause.

Chart 7: Calculated Waste Heating Value

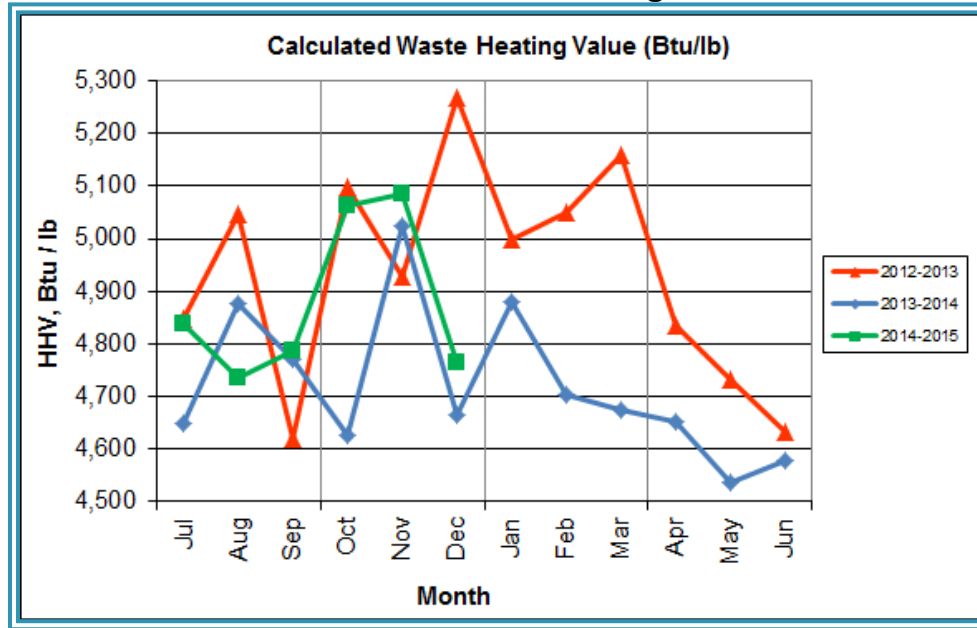


Chart 7 illustrates that Q2FY15 calculated average waste heating value was higher (4.2%) at 4,970 Btu/lb than the corresponding quarter Q2FY14, which averaged 4,771 Btu/lb.

Table 2: Quarterly Performance Summaries

Month		Waste Processed (tons)	Waste Diverted (tons)	Ash Shipped (tons)	Special Handling (Supplemental) (tons)	Ferrous Recovered (tons)	Steam Produced (klbs)	Net Electrical Generation (MWhr)
Q2FY13	Quarterly Totals	84,822	0	18,391	664	2,429	546,639	34,177
	October-12	28,661	0	6,205	25	852	186,789	8,225
	November-12	29,144	0	6,146	234	837	180,656	12,898
	December-12	27,017	0	6,040	405	740	179,194	13,054
Q2FY14	Quarterly Totals	85,286	0	17,833	866	2,027	517,968	33,068
	October-13	27,989	0	5,763	410	658	165,840	11,198
	November-13	28,043	0	6,008	188	689	179,483	9,705
	December-13	29,254	0	6,062	268	680	172,645	12,165
Q2FY15	Quarterly Totals	85,456	0	17,912	1,814	2,492	530,413	37,911
	October-14	27,883	0	5,990	521	846	178,450	12,745
	November-14	27,099	0	5,799	764	793	172,875	12,276
	December-14	30,474	0	6,123	529	853	179,088	12,890
FY15 YTD Totals		173,115	0	35,663	2,570	4,957	1,060,438	74,717
FY14 Totals		349,118	0	72,071	3,549	8,922	2,099,974	143,064
FY13 Totals		347,790	0	73,446	2,665	9,063	2,154,201	148,366

Table 2 presents the production data provided to HDR by CAAI for Q2FY15 on both a monthly and quarterly basis. For purposes of comparison, data for Q2FY13 and Q2FY14 are also shown, as well as FY13, FY14 and year to date FY15 totals.

In comparing quarterly totals, the data shows:

- More waste was processed in Q2FY15 than Q2FY14 and Q2FY13
- More steam was generated in Q2FY15 than Q2FY14 and less than Q2FY13
- More electricity was generated in Q2FY15 than Q2FY14 and Q2FY13
- Significantly more supplemental waste was received in Q2FY15 than Q2FY14 and Q2FY13.

Please note that the total steam generation figures presented in Table 2 do not correlate with the annual steam production limit from the Facility Permit; such limits apply on a 12-month rolling average monthly basis, and not a fiscal year basis. It is also worth noting that the quantity of waste processed during Q2FY15 and FY15 continues to be limited by the steam production permit restrictions (refer to Chart 5).

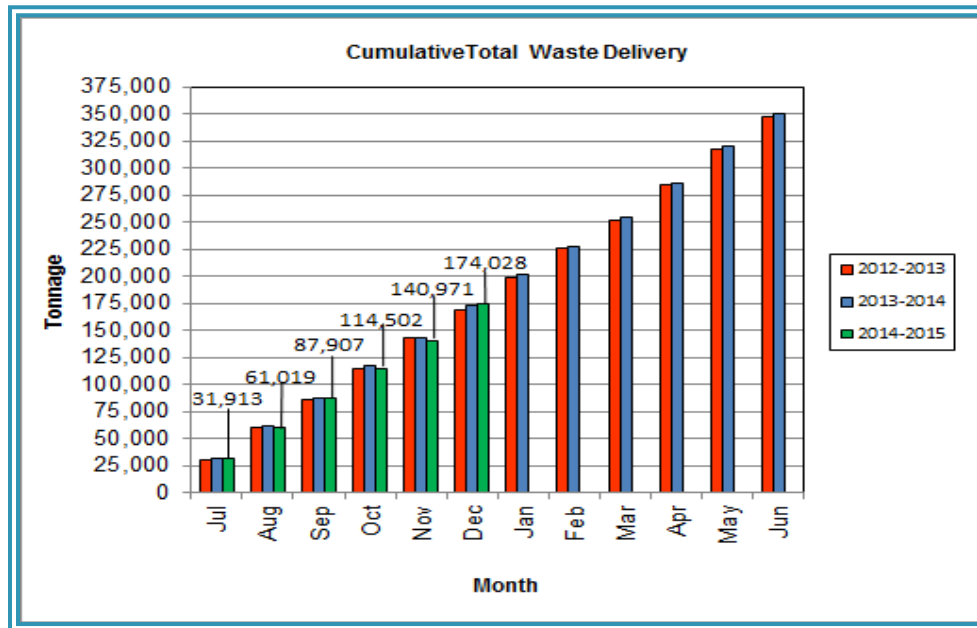
Table 3: Waste Delivery Classification

		Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Totals	% of Total
FY11	Jurisdiction Waste	18,201	19,320	18,100	18,244	17,812	17,394	16,316	15,212	18,279	18,596	20,355	19,382	217,213	62.20%
	Spot Waste tons	13,996	13,917	11,696	9,336	10,177	11,441	12,968	7,016	8,459	10,177	12,947	9,657	131,786	37.74%
	Supplemental Waste	8	17	12	13	6	13	14	34	25	29	26	6	203	0.06%
	MSW Totals	32,205	33,254	29,808	27,593	27,995	28,848	29,298	22,262	26,763	28,803	33,328	29,044	349,202	100.00%
FY12	Jurisdiction Waste	18,112	20,021	19,304	17,796	17,523	17,211	16,202	14,952	17,430	18,338	20,138	18,361	215,381	61.89%
	Spot Waste tons	8,901	13,623	13,303	9,788	11,976	11,900	10,276	10,697	10,283	10,029	11,333	10,177	132,295	38.01%
	Supplemental Waste	10	10	34	15	15	21	12	22	15	23	68	91	336	0.10%
	MSW Totals	27,023	33,654	32,641	27,599	29,514	29,132	26,490	25,672	27,729	28,390	31,539	28,629	348,012	100.00%
FY13	Jurisdiction Waste	19,413	18,357	16,632	17,625 ⁽¹⁾	18,838	16,195	-	-	-	-	-	-	107,058	30.76%
	Spot Waste tons	10,516	11,326	10,610	10,317	9,330	9,558	-	-	-	-	-	-	61,656	17.72%
	City Waste	-	-	-	-	-	-	1,683 ⁽¹⁾	1,287	1,444	2,382	2,286	1,919	11,000	3.16%
	County Waste	-	-	-	-	-	-	2,442 ⁽¹⁾	2,100	2,372	3,381	3,932	3,309	17,536	5.04%
	Municipal Solid Waste	-	-	-	-	-	-	25,019 ⁽¹⁾	23,637	21,661	27,066	25,794	24,930	148,107	42.56%
	Supplemental Waste	151	11	80	25	234	405	363	365	76	403	281	271	2,665	0.77%
	MSW Totals	29,928	29,683	27,241	27,942	28,167	25,753	29,507	27,388	25,552	33,231	32,293	30,429	348,022	100.00%
FY14	City Waste	2,065	1,693	1,702	1,924	1,566	1,780	1,529	1,231	1,556	2,256	2,203	1,883	21,389	6.11%
	County Waste	3,459	3,079	2,784	3,091	2,707	2,802	2,568	1,957	2,272	3,326	3,987	3,387	35,419	10.12%
	Municipal Solid Waste	26,167	23,604	22,034	23,354	21,879	25,531	23,869	22,523	23,198	25,414	27,206	24,812	289,590	82.75%
	Supplemental Waste	546	676	248	410	188	268	275	192	231	253	151	110	3,548	1.01%
	MSW Totals	32,237	29,053	26,768	28,779	26,340	30,380	28,241	25,903	27,256	31,249	33,546	30,193	349,946	100.00%
FY15	City Waste	1,814	1,497	1,699	1,737	1,518	1,770							10,035 ⁽²⁾	5.77%
	County Waste	3,297	2,868	2,973	3,095	2,508	2,852							17,593 ⁽²⁾	10.11%
	Municipal Solid Waste	26,661	24,466	21,887	21,241	21,678	27,906							143,840 ⁽²⁾	82.65%
	Supplemental Waste	141	275	329	521	764	529							2,559 ⁽²⁾	1.47%
	MSW Totals	31,913	29,106	26,888	26,595	26,468	33,057							174,028 ⁽²⁾	100.00%

Note (1): Beginning January 2013, the method in which waste was classified was modified as compared to prior periods due to change in contractual obligations and plant ownership

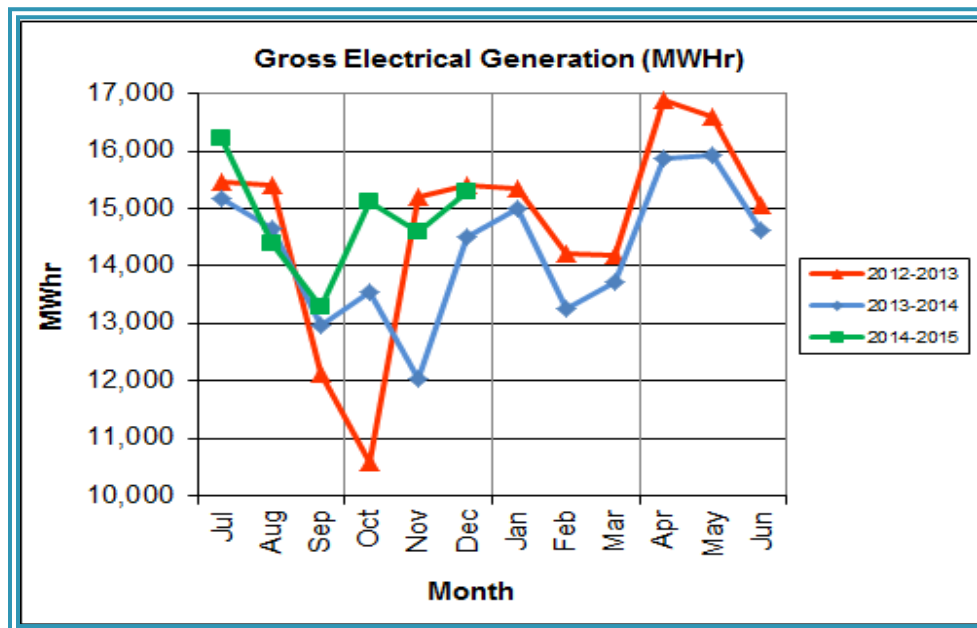
Note (2): Totals are Year to Date (YTD) Values

Chart 8: Cumulative Total Waste Delivery



As depicted in Table 3 and Chart 8, for the period ending in December 2014; cumulative total waste delivery was 0.3% more compared to the same period in FY14.

Chart 9: Gross Electrical Generation



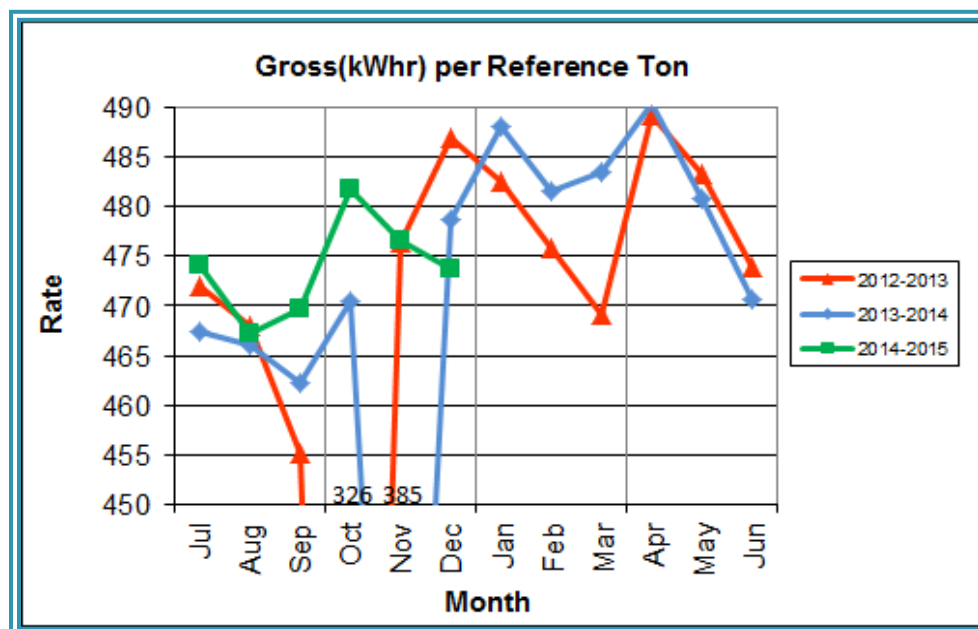
During Q2FY15, the Facility generated 44,985 MWhrs (gross) of electricity compared to Q2FY14 generation of 40,089 MWhrs (gross), a 12.2% increase.

The increase in gross electrical production is attributable to the increase in steam

production, as well as less (684.0 fewer hours) of scheduled, unscheduled, and standby downtime experienced by the turbine generators.

Note that the 3-year low of gross electrical production experienced in October 2012 was due to Turbine Generator No. 1 experiencing 494.5 hours of downtime for scheduled maintenance and again in November 2013 when Turbine Generator No. 2 had a major overhaul and experienced 494.8 hours of downtime. Evidence of the downtime experienced by the Turbine Generators is also apparent in Chart Nos. 10 through 14, including sharp spikes in the trends for the months of October 2012 and November 2013 when the Overhauls were conducted on Turbine Generator Nos. 1 and 2, respectively. Also, metrics in Charts 10 through 12 for Q2FY15 are significantly higher, and Charts 13 and 14 for Q2FY15 are significantly lower when compared to Q2FY14 as a result of less downtime experienced with no turbine generator overhaul being conducted.

Chart 10: Gross Conversion Rate



As shown in Chart 10, the average gross electrical generation per reference ton of refuse processed during Q2FY15 was 477 kWhr, which is 7.4% higher than the corresponding quarter in FY14. Since this calculated value uses reference or

normalized tonnages of waste, it should cancel the effect of MSW heating value (Btu content) variability.

Chart 11: Net Conversion Rate

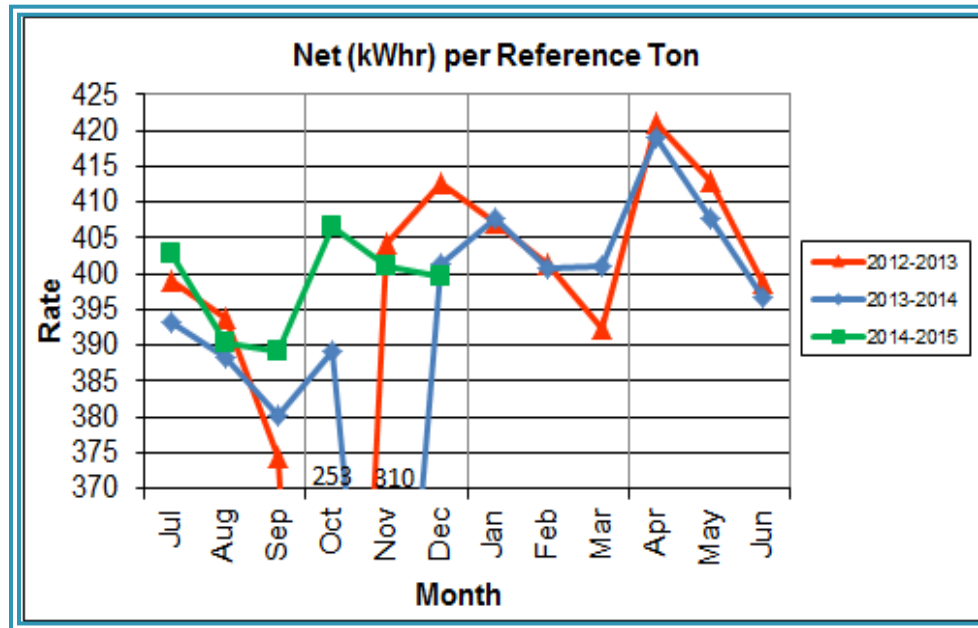


Chart 11 depicts the normalized net power (gross minus in-house usage) generation history. In Q2FY15, the average net electrical generation per reference ton was 394 kWhr, which is 9.7% higher than the corresponding quarter in FY14.

Chart 12: Net Conversion Rate

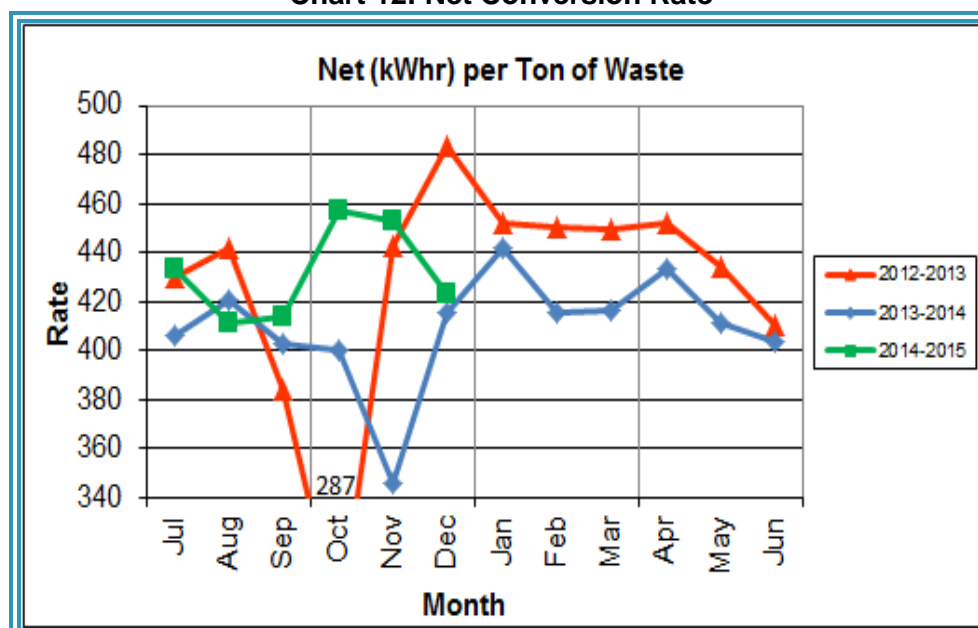
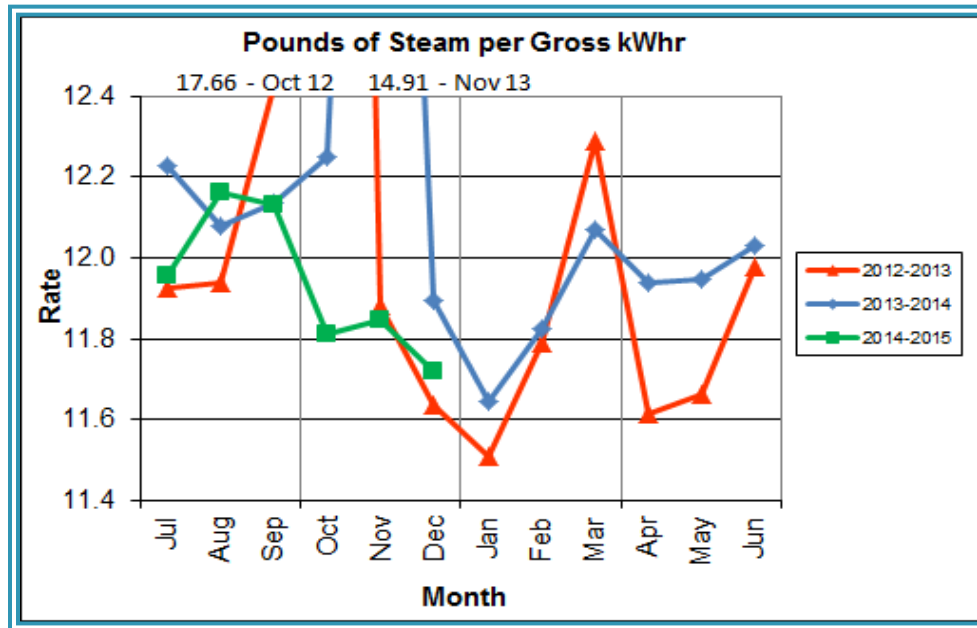


Chart 12 depicts the net power generation per processed ton. The net electrical generation per processed ton in Q2FY15 was 444 kWhr, which is 14.7% higher than the corresponding quarter in FY14.

Chart 13: Gross Turbine Generator Conversion Rate

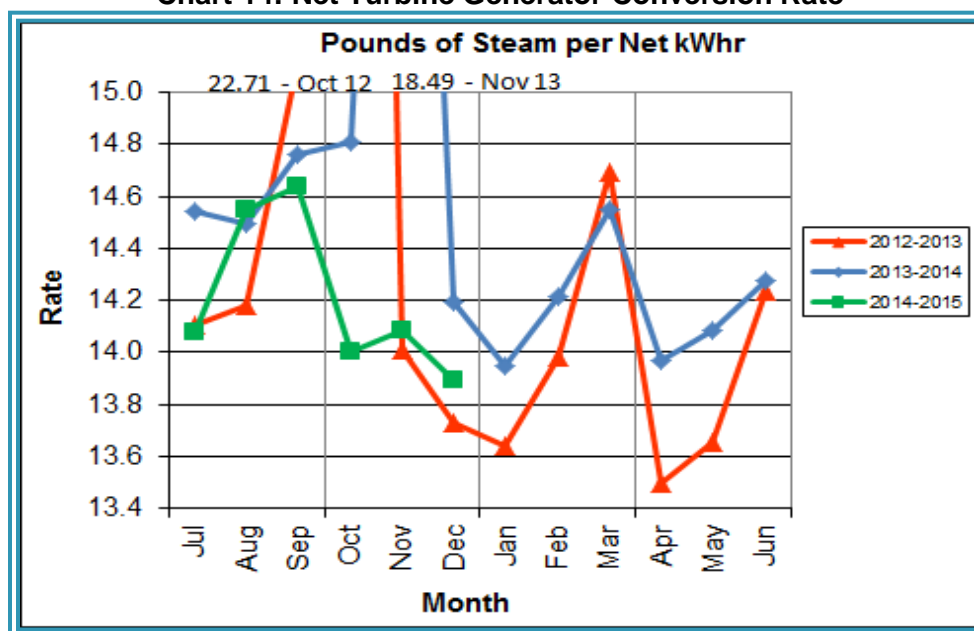


Charts 13 and 14 illustrate the quantities of steam required to generate one kWhr of electricity, gross and net respectively. This measure is a turbine generator performance indicator, where lower steam rates indicate superior performance. For simplification, this calculated rate is based on the average for the two turbine generators. In Q2FY15 the average lbs of steam consumed per gross kWhr was 11.8, which is significantly lower (8.7%) than the corresponding quarter Q2FY14, and indicative of improved performance of the Turbine Generators. The average lbs of steam consumed per net kWhr was 14.0, which is significantly lower (10.7%) than the corresponding quarter in FY14. The average steam temperature during the quarter was 677.9° F, which is 0.3% higher than the average steam temperature of the corresponding quarter last year and 22.1° F lower than design temperature of 700° F.

CAAI reported that during the Turbine Generator No. 2 overhaul in November 2013, some cracking was observed on the Stage 9 blades of the rotor, and the blading in that row was removed as a precautionary measure. CAAI indicated

that a new set of blades will be manufactured and installed during a Turbine Generator No. 2 Outage in 2016.

Chart 14: Net Turbine Generator Conversion Rate



4.1 Utility and Reagent Consumptions

Table 4: Facility Utility and Reagent Consumptions

Utility	Units	Q2FY15 Total	Q2FY14 Total	Q2FY15"Per Processed Ton" Consumption	Q2FY14"Per Processed Ton" Consumption	FY15 YTD Total	FY14 Total
Purchased Power	MW/hr	5,500	5,618	0.06	0.07	11,049	22,724
Fuel Oil	Gal.	9,630	17,140	0.11	0.20	17,290	54,350
Boiler Make-up	Gal.	2,044,000	2,034,000	23.92	23.85	4,503,000	8,629,000
Cooling Tower Make-up	Gal.	33,436,464	29,601,856	391.27	347.09	74,163,808	131,237,906
Pebble Lime	Lbs.	1,384,000	1,240,000	16.20	14.54	2,566,000	5,090,000
Ammonia	Lbs.	159,000	158,000	1.86	1.85	331,000	648,000
Carbon	Lbs.	102,000	100,000	1.19	1.17	206,000	406,000
Dolomitic Lime	Lbs.	208,000	160,000	2.43	1.88	472,000	1,084,000

Fuel oil usage during the quarter represents approximately 0.17% of the total heat input to the boilers, which compares favorably with industry averages, and lower than the percentage of heat input in Q2FY14 which was 0.31%. Fuel oil is used to stabilize combustion of wet fuel, as well as during start-up and shut-down

of the boilers for maintenance. Boiler makeup water usage during the quarter represents 3.2% of steam flow, and is acceptable. Pebble lime usage, at 1,384,000 lbs. is significantly higher (11.6%) than the corresponding quarter last year, and the quarterly consumption rate of 16.2 lbs/ton is within historical levels (16-18 lbs/ton).

In comparing Q2FY15 to Q2FY14 on a per processed ton consumption basis:

- the purchased power consumption rate was 2.3% lower
- the total fuel oil consumption rate was 43.9% lower
- the boiler make-up water consumption rate was 0.3% higher
- the cooling tower make-up water consumption rate was 12.7% higher
- the total pebble lime consumption rate was 11.4% higher
- the ammonia consumption rate was 0.4% higher
- the carbon consumption rate was 1.8% higher
- the total dolomitic lime consumption rate was 29.7% higher

4.2 Safety & Environmental Training

The Facility had no recordable accidents during the quarter and has operated 1,504 days without an OSHA recordable incident through the end of December 2014. Safety and Environmental training was conducted during the quarter with themes as follows:

October 2014

- Safety:
 - Accident and Injury Prevention
 - Holiday Safety
 - Hazard Communication
- Environmental:
 - Non-Ferrous Separators
 - Water Balance
 - Water Testing
 - Storm Water

November 2014

- Safety:
 - Hot Work
 - Grinder Safety
 - Ladder safety and Storage
 - Solid Waste Receipts
 - Tipping Floor Operations
- Environmental:
 - Department of Transportation (DOT) Requirements
 - Load Inspections Standard Operating Procedure (SOP)
 - Prohibited Waste Response SOP

December 2014

- Safety:
 - Scaffolding and Inspections
 - Internally Generated Waste Management
 - Fall Protection and Prevention
 - Fall Protection Equipment Inspections
 - Flagging and Barricades
- Environmental:
 - Hazardous Waste Management
 - Universal Waste Management

5.0 Facility Maintenance

Throughout the quarter, significant routine and preventative maintenance was performed. HDR considers that the Facility is implementing an effective maintenance regimen, and is performing routine and preventative maintenance, along with selected equipment replacements in a timely manner. CAAI monthly maintenance reports provide a detailed account of maintenance performed.

Beginning on October 12, 2014, Boiler No. 2 experienced 110.7 hours of downtime for scheduled maintenance. Some significant maintenance activities conducted during the outage include:

- Replacement of the Superheater Safety Valve
- Replacement of the SDA City Water Ball Valve to the Atomizer
- Repair of the SDA Hopper Rod-Out Port
- Replacement of the top vent valve on the Economizer
- Modification of the SDA Drain Line
- Re-Attachment of the angle iron around the convection pass hopper that came loose during explosive blast cleaning
- Re-plating of the front wall of the Ash Discharger, and installation of new traverse wall liner plates
- Re-routing of the airlines in the Baghouse breezeway
- Replacement of one (1) broken grate bar on Run 2 Side, Step No. 7, Bar No. 3
- Replacement of the Over Fire Air Fan Motor
- Replacement of the Sootblower elements on the G9B Nos. 3, 4, and 27
- Replacement of 49 tube shields, five (5) hangers, and five (5) wall mounts in the Superheater
- Installation of the new Induced Draft Fan Guard
- Replacement of Run No. 3 Side Feed Ram Hydraulic Cylinder

Beginning on November 8, 2014, Boiler No. 3 experienced 131.5 hours of downtime, and Turbine Generator No. 1 experienced 107.3 hours of downtime for scheduled maintenance. Some significant maintenance activities conducted during the outages include:

- Replacement of the gasket and repair of the steam cut flange for No. 1 Turbine Medium Pressure Extraction Gauge Line

- Replacement of the Under Fire Air Fan Motor, Coupling, Sleeves, and Hubs on both the Inboard and Outboard Bearings and Housings
- Installation of a new style guard to cover the coupling and exposed shafts on the Under Fire Air Fan
- Replacement of one (1) broken grate bar
- Removal of the piping and installation of two (2) solenoid valves for the Turbine Oil on Turbine Generator No. 1
- Installation of a 10-inch check valve and Turbine Water Induction Protection (TWIP) Valve in the Low Pressure Extraction Line on Turbine Generator No. 1
- Installation of a 4-inch check valve and TWIP Valve in the High Pressure Extraction Line on Turbine Generator No. 1
- Replacement of baffle plates on the 4th Floor level inlet side to the generating bank
- Replacement of Sootblower elements on G9B Nos. 10, 12, and 14
- Removal and replacement of 29 tube shields and repair of three (3) hangers, 24 tube guides and eight (8) wall hangers
- Replacement of one (1) feed ram slide block
- Replacement of Run No. 2 side grate drive hydraulic cylinder
- Replacement of five (5) belly wear plates, two (2) lower side wear plates, and five (5) traverse wall liner plates in the ash discharger
- Replacement of the coupling guard on the Induced Draft Fan to cover the coupling and shaft

In addition maintenance activities conducted during the Boiler Nos. 2 and 3, and Turbine Generator No. 1 Outages during the quarter, CAAI reports that 840 preventative maintenance actions were completed during the quarter.

5.1 Availability

Facility availabilities for Q2FY15 are shown in Table 5. According to CAAI reports, the average unit availabilities for Boiler Nos. 1, 2, and 3 for Q2FY15

were 100.0%, 93.6%, and 93.9%, respectively. The three-boiler average availability during the quarter was 95.8%, which is good.

During Q2FY15, the average availability for Turbine Generator Nos. 1 and 2 was 97.5%, and 99.8%, respectively, which is excellent. Note that the reported unit availability percentages exclude standby time.

Table 5: Quarterly Facility Unit Availabilities

Availability	Q1FY15 Average	Q2FY15 Average	FY15 YTD Average
Boiler No. 1	93.8%	100.0%	96.9%
Boiler No. 2	100.0%	93.6%	96.8%
Boiler No. 3	96.2%	93.9%	95.0%
Avg.	96.7%	95.8%	96.3%
Turbine No. 1	100.0%	95.0%	97.5%
Turbine No. 2	100.0%	99.6%	99.8%
Avg.	100.0%	97.3%	98.7%

5.2 Downtime Summary

During the quarter, the Facility experienced one (1) instance of unscheduled downtime for the boilers totaling 30.5 hours, and one (1) instance of unscheduled downtime for the turbine generators totaling 9.0 hours. Beginning October 12, 2014, Boiler No. 2 experienced 110.7 hours of downtime for scheduled maintenance. Beginning November 8, 2014, Boiler No. 3 experienced 131.5 hours of downtime, and Turbine Generator No. 1 experienced 107.3 hours of downtime for scheduled maintenance. The boilers experienced three (3) instances of standby time totaling 84.2 hours, and the turbine generators experienced one (1) instance of standby time totaling 63.0 hours during the quarter. All of the boiler standby time was reported to be a preventative measure to avoid exceeding the steam permit limit on a monthly basis. Details of downtime events experienced during the quarter are portrayed in Tables 6 and 7:

Table 6: Boiler Downtime – Q2FY15

Boiler Number	Outage Begin Date	Outage End Date	Hours Unavailable	Downtime Classification	Reason Unavailable
3	10/7/14	10/9/14	48.3	Standby	Preventative measure taken to avoid exceeding 350,000 ton rolling 12-month process limit
2	10/10/14	10/11/14	27.9	Standby	Preventative measure taken to avoid exceeding 350,000 ton rolling 12-month process limit
2	10/12/14	10/16/14	110.7	Scheduled	Fall 2014 Scheduled Maintenance
2	11/5/14	11/6/14	30.5	Unscheduled	Tube leaks in the Furnace and Second Pass
3	11/8/14	11/13/14	131.5	Scheduled	Fall 2014 Scheduled Maintenance
3	12/31/14	12/31/14	8.0	Standby	Preventative measure taken to avoid exceeding 350,000 ton rolling 12-month process limit
Total Unscheduled Downtime			30.5 Hours		
Total Scheduled Downtime			242.2 Hours		
Total Standby Downtime			84.2 Hours		
Total Downtime			356.9 Hours		

Table 7: Turbine Generator Downtime – Q2FY15

Turbine Generator Number	Outage Begin Date	Outage End Date	Hours Unavailable	Downtime Classification	Reason Unavailable
1	11/8/14	11/12/14	107.3	Scheduled	Scheduled Maintenance to install TWIP and Check Valves in the Extraction Lines
2	12/29/14	12/29/14	9.0	Unscheduled	Repair of a Condenser Tube Leak
2	12/29/14	12/31/14	63.0	Standby	Preventative measure taken to avoid exceeding 350,000 ton rolling 12-month process limit
Total Unscheduled Downtime			9.0 Hours		
Total Scheduled Downtime			107.3 Hours		
Total Standby Downtime			63.0 Hours		
Total Downtime			179.3 Hours		

5.3 Facility Housekeeping

CAAI is performing Facility housekeeping and maintaining plant cleanliness in accordance with acceptable industry practices. A site inspection was conducted in August 2014. At the time of the inspection, new deficiencies were recorded and prior deficiencies were given a status update. Photos of interest from the inspection are depicted in Appendix B. The Facility housekeeping ratings from the August 2014 inspection are presented in Table 8.

Table 8: Facility Housekeeping Ratings – November 2014

Facility Area	Highly Acceptable	Acceptable	Needs Improvement	Unacceptable
Tipping Floor			√ ⁽¹⁾	
Citizen's Drop-off Area			√ ⁽²⁾	
Tipping Floor Truck Exit		√		
Front Parking Lot		√		
Rear Parking Lot		√		
Boiler House Pump Room		√		
Lime Slurry Pump Room		√		
Switchgear Area		√		
Ash Load-out Area		√		
Vibrating Conveyor Area	√			
Ash Discharger Area		√		
Cooling Tower Area		√		
Truck Scale Area		√		
SDA/FF Conveyor Area		√		
SDA Penthouses		√		
Lime Preparation Area		√		
Boiler Drum Levels		√		
Turbine Room			√ ⁽³⁾	
Electrical Room		√		

Note (1): Tipping Floor – Needs Improvement

- Wall panels damaged
- Deteriorated Purlin (See Figure 1 – Appendix B)
- Missing glass windowpanes (See Figure 2 – Appendix B)

Note (2): Citizen's Drop-off Area – Needs Improvement

- Spider cracking (2010 Deficiency) and pothole (2012 Deficiency)
- Damaged Curbing (See Figure 3 – Appendix B)

Note (3): Turbine Room – Needs Improvement

- Multiple roof leaks observed
- Ceiling panels corroded

6.0 Environmental

The retrofit air pollution control equipment maintained emission concentrations well within the established regulations. Average Continuous Emission Monitoring System (CEMS) data collected for each monthly period during Q2FY15 are summarized in Appendix A. The Facility experienced no environmental exceedances during the quarter.

On August 8, 2014, CAAI requested via letter to the Virginia Department of Environmental Quality (VADEQ) relief from the steam permit limit requirements in the Facility's Title V and PSD permits. These requested changes relate to the permit values established for the steam to waste ratio, the result of which is a reduction in MSW throughput than would be the case with different value(s) for this established ratio. In recent discussions, CAAI indicated that it is re-evaluating options to the proposed permit changes, and will provide further updates on this issue.

6.1 Nitrogen Oxide Emissions

During Q2FY15, the monthly emission concentrations of nitrogen oxides (NO_x) averaged 167.0 ppmdv, 161.3 ppmdv and 162.7 ppmdv for Boiler Nos. 1, 2, and 3, respectively. CAAI continues to operate the units at the lower (160 ppmdv) set-points, except immediately following a scheduled outage and associated boiler cleaning.

6.2 Sulfur Dioxide Emissions

During Q2FY15 the monthly emission concentration of stack sulfur dioxide (SO₂) averaged 0.7 ppmdv, 1.3 ppmdv, and 1.0 ppmdv for Boiler Nos. 1, 2, and 3, respectively. All of these stack SO₂ concentrations are significantly below the 40 CFR Subpart Cb requirement of 29 ppmdv @ 7% O₂.

6.3 Carbon Monoxide Emissions

During Q2FY15, the average CO emission concentrations on Boiler Nos. 1, 2, and 3 were 37.3 ppm_{dv}, 39.3 ppm_{dv}, and 27.3 ppm_{dv}, respectively, and all are well within permit limits (100 ppm_{dv}, hourly average).

6.4 Opacity

During Q2FY15, the average opacity for Boiler Nos. 1, 2, and 3 was 1.1%, 0.8%, and 0.5% respectively. All of these averages are significantly below the 10% (6-minute) average permit limit.

6.5 Daily Emissions Data

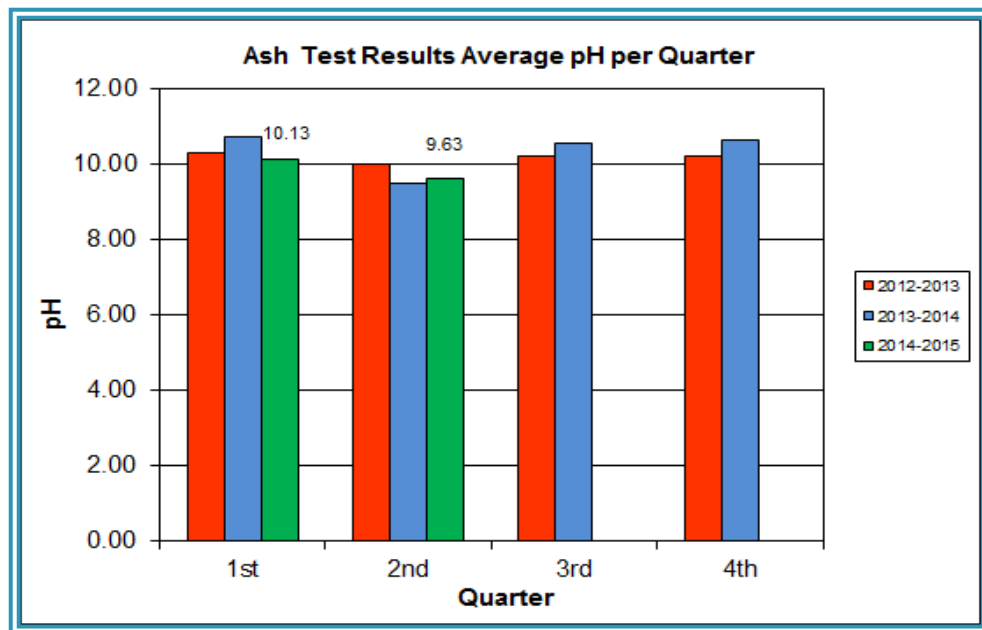
Appendix A, Tables 9, 10, and 11 tabulate the monthly average, maximum, and minimum emissions data for each unit during Q2FY15. Excursions, if any, would appear in bold print. It should be noted that these tabulations of monthly averages, reported here for informational purposes, are based on tabulations of daily averages. These averages do not correlate with official reports to the regulatory agencies because of differences in averaging times and other technical differences required by agency report formats.

6.6 Ash System Compliance

The dolomitic lime feed rate is adjusted periodically in order to maintain a desired ash pH level in the range of 8.0 to 11.0. Since initial startup, the feed rate has varied from between 4 to 9 lbs per ton. Ash Toxicity (TCLP) tests were not performed during Q2FY15.

CAAI also samples ash monthly in-house, and documents pH reading to adjust dolomitic lime feed rate. The results for the ash pH tests are found below in Chart 15 where each quarter is represented by the average of the respective monthly readings. During Q2FY15, the average ash pH for in-house tests was 9.6.

Chart 15: Quarterly Ash Test Results



APPENDIX A FACILITY CEMS DATA

Table 9: Unit #1 Monthly Summary for Reportable Emissions Data

Group#-Channel#		G8-C35	G8-C28	G8-C8	G8-C4	G8-C12	G8-C34	G8-C37	G8-C40	G8-C39
Long Descrip.		U-1 Steam	U-1 Econ	U-1 Stack	U-1 Stack	U-1 Stack	U-1 Opaci	U-1 FF In	U-1 Carbo	U-1 Lime
Short Descrip.		SteamFl	SO ₂ ec	SO ₂ sc	COsc	NO _x sc	Opacity	FF InTemp	CarbInj	LimeFlow
Units		K#/Hr	ppmc	ppm	ppmc	ppmc	%	deg F	#/hr	gpm
Range		0-100	0-2000	0-500	0-4000	0-1000	0-100	100-500	0-50	0-20
Oct-14	AVG	85.0	45.0	1.0	32.0	169.0	1.0	302.0	16.4	3.0
	Max	87.8	70.0	4.0	47.0	189.0	1.4	305.0	16.8	3.4
	Min	78.5	28.0	0.0	21.0	161.0	0.3	300.0	16.2	2.8
Nov-14	AVG	81.9	33.0	0.0	45.0	166.0	1.1	302.0	16.3	3.0
	Max	85.2	50.0	2.0	59.0	173.0	1.5	303.0	16.6	3.3
	Min	74.0	18.0	0.0	31.0	161.0	0.7	299.0	16.1	2.8
Dec-14	AVG	75.8	25.0	1.0	35.0	166.0	1.1	303.0	16.2	2.9
	Max	80.5	39.0	2.0	56.0	167.0	1.4	307.0	16.4	3.1
	Min	65.2	14.0	0.0	18.0	165.0	0.8	302.0	16.2	2.7
Quarter Average		80.9	34.3	0.7	37.3	167.0	1.1	302.3	16.3	3.0
Quarter Max Value		87.8	70.0	4.0	59.0	189.0	1.5	307.0	16.8	3.4
Quarter Min Value		65.2	14.0	0.0	18.0	161.0	0.3	299.0	16.1	2.7
Limits:		98	NA	29	100	205	10	333	16(a)	

(a) Carbon flow limit is a minimum value

* Note: The data reported herein represent 24 hour average data for all parameters. Emissions excursions that are measured on shorter time intervals (ie., 4-hour block averages for CO) do not correlate with the 24 hour average data reported above.

Table 10: Unit #2 Monthly Summary for Reportable Emissions Data

Group#-Channel#		G8-C35	G8-C28	G8-C8	G8-C4	G8-C12	G8-C34	G8-C37	G8-C40	G8-C39
Long Descrip.		U-2 Steam	U-2 Econ	U-2 Stack	U-2 Stack	U-2 Stack	U-2 Opaci	U-2 FF In	U-2 Carbo	U-2 Lime
Short Descrip.		SteamFI	SO ₂ ec	SO ₂ sc	COsc	NO _x sc	Opacity	FF InTemp	CarbInj	LimeFlow
Units		K#/Hr	ppmc	ppm	ppmc	ppmc	%	deg F	#/hr	gpm
Range		0-100	0-2000	0-500	0-4000	0-1000	0-100	100-500	0-50	0-20
Oct-14	AVG	90.6	47.0	2.0	36.0	167.0	0.2	297.0	16.3	2.8
	Max	93.5	82.0	5.0	43.0	185.0	1.0	298.0	16.6	3.3
	Min	86.7	14.0	0.0	26.0	152.0	0.0	296.0	16.2	0.1
Nov-14	AVG	90.5	46.0	1.0	41.0	159.0	1.1	297.0	16.3	2.9
	Max	92.6	66.0	6.0	53.0	167.0	2.3	297.0	16.6	3.3
	Min	82.0	30.0	0.0	30.0	154.0	0.1	295.0	16.1	2.7
Dec-14	AVG	84.7	30.0	1.0	41.0	158.0	1.2	297.0	16.3	2.9
	Max	91.7	50.0	4.0	51.0	161.0	2.3	297.0	16.5	3.1
	Min	67.8	13.0	0.0	25.0	157.0	0.0	296.0	16.0	2.7
Quarter Average		88.6	41.0	1.3	39.3	161.3	0.8	297.0	16.3	2.9
Quarter Max Value		93.5	82.0	6.0	53.0	185.0	2.3	298.0	16.6	3.3
Quarter Min Value		67.8	13.0	0.0	25.0	152.0	0.0	295.0	16.0	0.1
Limits:		96	NA	29	100	205	10	330	16(a)	

(a) Carbon flow limit is a minimum value

* Note: The data reported herein represent 24 hour average data for all parameters. Emissions excursions that are measured on shorter time intervals (ie., 4-hour block averages for CO) do not correlate with the 24 hour average data reported above.

Table 11: Unit #3 Monthly Summary for Reportable Emissions Data

Group#-Channel#		G8-C35	G8-C28	G8-C8	G8-C4	G8-C12	G8-C34	G8-C37	G8-C40	G8-C39
Long Descrip.		U-3 Steam	U-3 Econ	U-3 Stack	U-3 Stack	U-3 Stack	U-3 Opaci	U-3 FF In	U-3 Carbo	U-3 Lime
Short Descrip.		SteamFl	SO ₂ ec	SO ₂ sc	COsc	NO _x sc	Opacity	FF InTemp	CarbInj	LimeFlow
Units		K#/Hr	ppmc	ppm	ppmc	ppmc	%	deg F	#/hr	gpm
Range		0-100	0-2000	0-500	0-4000	0-1000	0-100	100-500	0-50	0-20
Oct-14	AVG	88.8	37.0	0.0	26.0	162.0	0.3	304.0	16.3	3.1
	Max	92.4	57.0	2.0	37.0	186.0	1.6	307.0	16.8	3.4
	Min	70.3	24.0	0.0	19.0	157.0	0.0	303.0	16.2	2.9
Nov-14	AVG	89.9	45.0	2.0	30.0	167.0	0.6	303.0	16.4	3.1
	Max	92.8	75.0	5.0	39.0	183.0	1.8	306.0	16.8	3.4
	Min	83.3	18.0	0.0	21.0	144.0	0.0	279.0	16.2	2.9
Dec-14	AVG	83.7	32.0	1.0	26.0	159.0	0.6	304.0	16.2	3.0
	Max	91.0	50.0	12.0	40.0	163.0	1.5	308.0	16.7	3.2
	Min	65.0	16.0	0.0	7.0	155.0	0.3	300.0	16.2	2.6
Quarter Average		87.5	38.0	1.0	27.3	162.7	0.5	303.7	16.3	3.1
Quarter Max Value		92.8	75.0	12.0	40.0	186.0	1.8	308.0	16.8	3.4
Quarter Min Value		65.0	16.0	0.0	7.0	144.0	0.0	279.0	16.2	2.6
Limits:		98	NA	29	100	205	10	327	16(a)	

(a) Carbon flow limit is a minimum value

* Note: The data reported herein represent 24 hour average data for all parameters. Emissions excursions that are measured on shorter time intervals (ie., 4-hour block averages for CO) do not correlate with the 24 hour average data reported above.

APPENDIX B

SITE PHOTOS – NOVEMBER 2014



Figure 1: Deteriorated purlin west wall in Tipping Floor Enclosure (New Deficiency)



Figure 2: Missing glass windowpanes west wall in Tipping Floor Enclosure (New Deficiency)



Figure 3: Damaged curbing southwest corner of Facility near Citizen's Drop-off (New Deficiency)

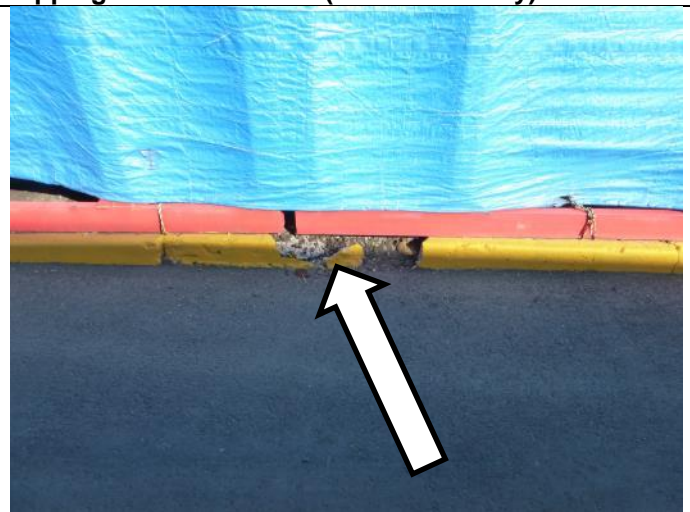


Figure 4: Damaged curbing east side of Cooling Towers (New Deficiency)



Figure 5: Pot-hole where pavement and concrete meet entering Tipping Floor Enclosure (New Deficiency)



Figure 6: Damaged curbing near Ash Trailer Parking Area (New Deficiency)



Figure 7: Turbine Generators



Figure 8: Cooling Towers from SDA No. 3 Penthouse

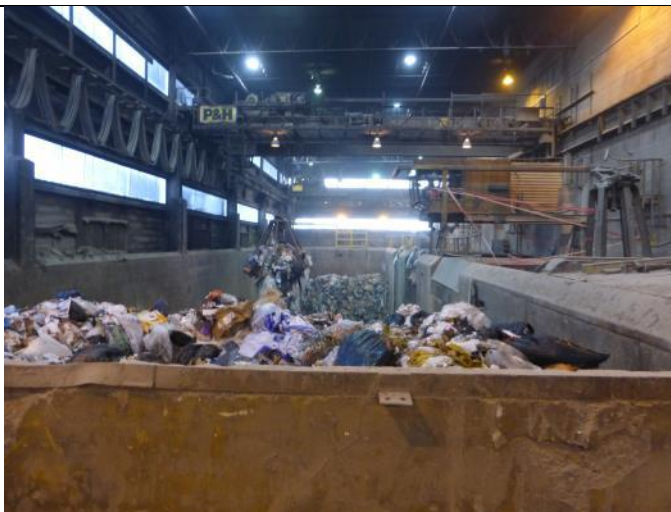


Figure 9: Pit View from South end of Charging Floor



Figure 10: Boiler No 3 Superheater – Boiler No. 3 Outage In Progress



Figure 11: Scaffolding and other outage materials at Barn Door Elevation – Boiler No. 3 Outage In Progress



Figure 12: Boiler No. 3 Grates – Boiler No. 3 Outage In Progress



Figure 13: Main Vibrating Ash Conveyor – No Issues Observed



Figure 14: Grinding of Ash Discharger No. 3 – Boiler No. 3 Outage In Progress



Figure 15: Ash Trailer Canopy – No Issues Observed



Figure 16: New Forklift



Figure 17: New Front-End Loader



Figure 18: Tipping Floor – New Skylighting Installed – Improved Visibility



Figure 19: Citizen's Drop-Off Roll-Off



Figure 20: Metal Drop-Off Roll-Off



Figure 21: General Facility View



Figure 22: Cooling Towers



Figure 23: Facility Scales - No Issues Observed

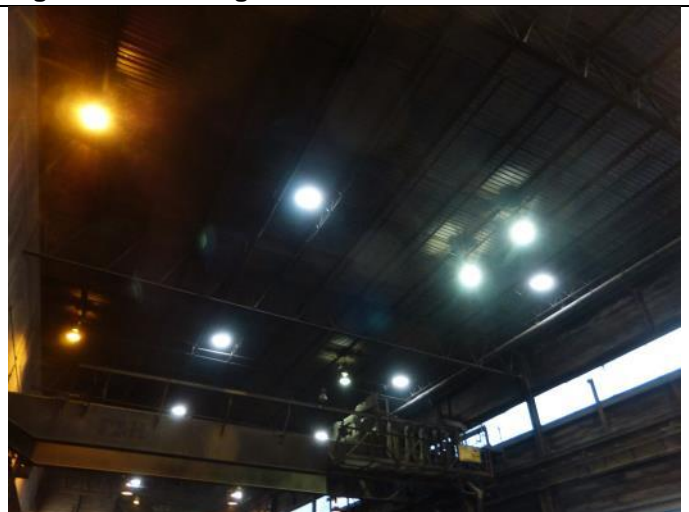


Figure 24: Charging Floor Skylighting – Improved Visibility